



# Code of Conduct and Desirable Work Practices

Pylon Public Company Limited

(19 December 2017)

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## 1. Definitions

Code of Conduct	refers to	the undertaking of business according to best practices.
Pylon, Company	refers to	Pylon Public Company Limited.
Pylon Group, Business Group	refers to	Pylon and its subsidiary.
The Subsidiary	refers to	<ol style="list-style-type: none"> <li>1. A company or juristic person owned by or in which more than 50% of shares with voting rights are held by the Company through either direct or indirect shareholding.</li> <li>2. A company or juristic person in which the Company has controlling authority in terms of financial and operating policies in order to gain benefits from activities of such company or juristic person.</li> </ol>
Directors and Subcommittee Members	refers to	directors and subcommittee members of the Company.
Employees	refers to	executives as well as permanent, temporary, and contract employees.
Related Persons	refers to	<p>persons with relationships in one of the follow manners.</p> <ol style="list-style-type: none"> <li>(1.) Persons with controlling authority in the Company, and in case of a juristic person, directors of such juristic person</li> <li>(2.) Spouses and children or adopted children (minors) of directors, executives, or persons as per (1)</li> <li>(3.) Juristic persons in which persons as per (1) or (2) have controlling authority</li> <li>(4.) Other persons with characteristics as prescribed by the Capital Market Supervisory Board’s announcement</li> </ol>
Stakeholders	refers to	persons related to the Company across different aspects such as shareholders, investors, directors, employees, customers, trading partners, creditors, business alliances, society, communities, and the environment.

Financial Disclosure	refers to	the disclosure of details of information regarding business activities of the Company according to the Public Limited Companies Act B.E. 2535 (A.D. 1992), the Securities and Exchange Act B.E. 2551 (A.D. 2008), and rules and regulations of the Stock Exchange of Thailand (SET) and the Office of the Securities and Exchange Commission (SEC).
Fraud/Corruption	refers to	all kinds of briberies such as offers, contracts, pledges or promises, or soliciting or accepting funds/assets or other benefits, with government agencies, private organizations, trading partners, customers, and stakeholders across all groups via direct or indirect means.
A Conflict of Interest	refers to	any activities that may involve a personal interest or a related person either through a bloodline or other means, which may influence a decision, or impede or obstruct the Company's maximum benefit.
Giving of Objects or Other Benefits	refers to	granting special privileges in forms of money, assets, objects or other benefits for a favor or as a reward or to build rapport
Bribery	refers to	offering to give or receive gifts, awards, or other benefits, to oneself or from other persons who would like to influence an action which is fraudulent, illegal, or in breach of the business code of conduct.
Customary Traditions	refers to	important festivals or activities that have been carried out as a symbolic tradition in society
Corporate Assets	refers to	movable or immovable assets, technologies, academic knowledge, information, rights, copyrights, or any resources owned or entitled to by the Company.

## 2. Message from the Chairman of the Board of Directors

Pylon Public Company Limited has been committed to doing business and managing operations based on its professional ethics and code of conduct, with a focus on achievement of management objectives. The Company developed a successful work practice manual by adhering to the code of conduct, integrity, and honesty in undertaking transactions. The manual also extends to the treatment of various groups of stakeholders, related party transactions, legal compliance, and prevention of a conflict of interest.

This document compiles a set of professional ethics and a business code of conduct of the Company. The implementation of those principles plays a crucial part in the Company's success. As such, the Company upholds this policy and expects its directors, executives, and employees to comply with the relevant code of conduct strictly.

Moreover, the Board of Directors deemed that there shall be revisions to or additions of clear guidelines regarding practices with the likelihood of corruption risks, such as giving or acceptance of gifts, giving or acceptance of entertainment, donations, etc., and that there shall be the development of whistleblowing channels and procedures for increasingly effective and transparent business operations, and earned recognition and trust from the stakeholders.

The Board of Directors believes that upholding the code of conduct in doing business will contribute to the Company's growth, secure advancement, and sustainability, as well as enhanced satisfaction and trust among all parties.



Mr. Seri Chintanaseri  
Chairman of the Board of Directors  
19 December 2017

### 3. Business Code of Conduct

#### 3.1 Principles of Doing Business

The Company operates its business under the principles of good corporate governance. In so doing, it established a code of conduct for its directors, executives, and employees to comply with, as part of the corporate values. This code of conduct shall help to ensure transparent, clear, fair, and efficient management and operations, and to gain confidence and trust from the shareholders and stakeholders across all groups. It shall serve as a foundation for the Company's development and advancement toward secure and sustainable growth.

The Company aims for its stakeholders to understand and uphold this code of conduct as guidance for their performance of duties according to the Company's missions with honesty, integrity, and fairness toward the Company, its stakeholders, and the public and society.

#### **Vision**

To strive to be the leading foundation contractor in quality and efficiency

#### **Commitments**

The Company is committed to promoting core values and a corporate culture aligned with the principles of good corporate governance as follows:

- To fully take responsibility for its shareholders and stakeholders through safeguarding the Company's assets and reputation
- To take responsibility for the missions the Company is entrusted with by upholding discipline and being aware of risks in its operations at present and in the future
- To adopt a decision-making process and work procedures that are clear, transparent, and disclosable for anti-corruption purposes
- To treat its stakeholders equitably and avoid bias or a situation where there is a conflict of interest
- To strive to build stability, sustainability, and long-term value for its shareholders
- To adopt best practices in its operations for continuously enhanced competitiveness

- To provide support and hospitality for its communities and the environment

### 3.2 Anti-Corruption Policy

The Company is committed to preventing and combating against all forms of corruption through direct and indirect means and to ensuring that business operations with possible corruption risks are considered prudently. To this end, the Company established an “Anti-Corruption” policy in writing as approved by the resolution of the Board of Directors’ Meeting No. 6/2017 held on 19 December 2017. According to the policy, all directors, executives, and employees are prohibited from committing or accepting all forms of corruption through direct or indirect means. The policy extends to the business operations of the Company’s subsidiary which shall strictly comply with the policy. The compliance with this anti-corruption policy, implementation guidelines, and operating requirements shall be regularly reviewed to ensure alignment with Thailand’s changing business and regulatory circumstances toward anti-corruption.

All directors, executives, and employees are required to comply with the anti-corruption policy, the anti-corruption measure manual, and the business code of conduct.

## 4. Directors’ Code of Conduct

The Company aims for its directors and subcommittee members to perform duties within a set of ethics and establish themselves or perform their duties with honesty, integrity, cautiousness, and prudence for the utmost benefit of the Company’s operations and stakeholders on an ongoing and sustainable basis.

### 4.1 Compliance with laws and corporate rules

4.1.1 To comply with established rules and regulations as well as laws governing the Company’s business as follows:

- (1) Directors shall comply with laws, rules, regulations, and requirements of the Stock Exchange of Thailand (SET) and the Office of the Securities and Exchange Commission (SEC)



- (2) Directors shall not avoid complying with concerned rules, regulations, and laws
  - (3) Directors shall provide collaboration with compliance functions established by the Company and report information regarding violations or non-compliance with relevant rules, regulations, and laws to such compliance functions
- 4.1.2 To perform duties with neutrality. At a meeting, a director with a possible conflict of interest on a particular matter shall leave the meeting room and refrain from participating in the decision-making process for such matter.
- 4.1.3 To avoid a conflict of interest for the transparency and efficiency in managing operations
- (1) Not to use information gained from the performance of duties for personal or others' gains
  - (2) Not to misuse or disclose confidential corporate data despite leaving or ending the employment status with the organization
  - (3) Not to seek personal interests from being a director
  - (4) Not to build an obligation that might later contradict one's own duties
  - (5) Not to accept objects or other benefits that may be deemed a conflict of interest for the organization
- 4.1.4 To protect confidential corporate data from leaking to irrelevant parties as leaks of such data could cause damage to the organization or its stakeholders, unless such data disclosure is required by law
- 4.1.5 Acquisitions or disposals of registered securities of directors, spouses, and minor children shall be in accordance with the SEC's Notification No. SorJor. 12/2552 Re: Preparation and disclosure of reports of securities holdings of directors, executives, and auditors.

## 4.2 A Conflict of Interest and Insider Information Use

### 4.2.1 A Conflict of Interest

The Board of Directors established a set of guidelines for its directors and employees to prevent a conflict of interest as follows:

- (1) To avoid a transaction involving oneself and possibly leading to a conflict of interest with the Company
- (2) In the case of a director having to undertake such transaction for the Company's benefit, one shall take relevant actions as if the transaction were done between the Company and an outside party with commercial terms and conditions similar to those entered into between a person of ordinary prudence and a general contract party. Also, the bargaining power must be free from the influence of directors or relevant parties; and such directors or relevant parties shall not take part in the consideration and approval process, and shall perform duties according to requirements of the SET and the SEC regarding disclosure of related party transactions.
- (3) In the case of a director of the Company assuming a position of director, shareholder, or advisor in another organization; such position assumption must neither involve a conflict of interest with the Company nor directly contradict the performance of duties for the Company.
- (4) Not to use opportunities or information gained from being a director or employee for personal gains or for doing business in competition with the Company's or other related business
- (5) To consider transactions with or possibly with conflicts of interest between shareholders, directors, executives and persons with other types of conflicts, the principles of fairness, transparency, reasonableness, and benefit for the Company shall be observed. Also, such transactions shall be undertaken based on relevant business conditions and the SEC's requirements; and information disclosure shall be correct and complete as well as integrated as part of the corporate annual report.
- (6) Insider information shall not be used for personal gains, for example, by purchasing and selling the Company's shares, or by sharing insider information with other persons as guidance for purchasing and selling the Company's shares.

- (7) A person with actions related to a conflict of interest with the Company's business through direct or indirect means shall have the duty to report such interest as follows:
- Directors and executives shall report their stake immediately when a relevant transaction took place. To ensure the Company's regular audits, its corporate secretary is assigned to check all transactions involving a conflict of interest at year-end and report such transactions to the Board of Directors' meeting at least once per year.
  - Executives at supervisory levels, i.e. department manager through general manager, and relevant employees, in line with the good corporate governance policy, shall report their stake immediately when a relevant transaction took place and/or any transactions regularly involving a conflict of interest at year-end. The corporate secretary shall check and report such transactions to the President and present such matter to the Board of Directors' meeting for acknowledgement at least once per year.
- (8) The Company's directors, executives, and employees with knowledge of insider information shall adopt insider information guidelines for their operations. Also, directors and executives shall report their securities holdings according to the SEC's requirements to the Board of Directors.
- (9) It shall be generally announced that directors, executives, and employees with knowledge of material insider information that may lead to changes in securities trading prices must suspend their trading transactions of the Company's securities during one month before the Company's announcement of its operating results or public disclosure of such information.
- (10) For the benefit of keeping track of the conflicts of interest of directors, executives, or related persons with the Company and its subsidiary's business management according to the Securities and Exchange Act, the Board of Directors requires that related party transaction data be reported on a quarterly basis (if any).

- (11) The employees shall not disclose any confidential corporate data for the benefit of any person during or after the employment with the Company.

#### 4.2.2 Insider Information Use

- (1) It is prohibited to use opportunities or information gained from being a director or employee for personal gains or for committing a business in competition with the Company's or other related business.
- (2) It is prohibited to use insider information for personal gains from trading the Company's shares, or to share insider information with third parties for their gains from trading the Company's shares.
- (3) It is prohibited to use corporate assets for personal gains and/or gains of relevant parties.
- (4) It is prohibited to use corporate data for references with third parties for personal gains and/or gains of relevant parties.
- (5) It is prohibited to disclose corporate trade secrets to third parties, especially rivals, even after the end of the employment as a director, executive, or employee of the Company.

## 5. Code of Conduct for Stakeholders

The Company shall treat its stakeholders by holding their rights according to law. It shall promote collaboration between itself and its stakeholders in building its business growth and sustainability.

### 5.1 Shareholder Treatment Policy

The Company stipulated the following principles of equitable treatment of its shareholders.

- 5.1.1 To do business with honesty, integrity, prudent decision-making, and fairness toward its shareholders for the ultimate benefit of all shareholders
- 5.1.2 To supervise operations to ensure that the Company has a sound financial position as well as management and administration to protect and enhance the shareholders' interests

- 5.1.3 To strive to drive quality and sustainable growth for satisfactory returns to the shareholders aligned with changing economic and industrial conditions
- 5.1.4 To respect the shareholders' equitable right to access necessary data for corporate assessment, and to disclose operating results, financial positions, and supporting data according to facts as per requirements of the SET and the SEC
- 5.1.5 To treat all shareholders equally at shareholders' meetings and in other cases
- 5.1.6 The Company shall manage its organization with morality and ethics. It shall promote morality and ethics among its employees at all levels and monitor any possible conflict of interest.

## 5.2 Employee Treatment Policy

Employees are at the heart of the Company's operations. People plays a crucial part in the Company's achievement of its goals. Therefore, the Company must ensure their well-being and treat them fairly in terms of equal opportunities, remuneration, promotion, transfer, or capacity building. The guidelines on employee treatment can be summarized as follows:

- 5.2.1 To treat employees with respect for their honor, dignity, and privacy rights
- 5.2.2 To maintain a safe working environment for employees' life and property
- 5.2.3 To appoint or transfer, or to reward or punish employees based on their individual integrity, knowledge, capabilities, and suitable attributes
- 5.2.4 To focus on employees' knowledge and capacity building through different forms of development such as seminars and trainings
- 5.2.5 To determine fair remuneration rates and welfare schemes for employees in line with short- and long-term operating results. Short-term factors include market conditions, business competition, nature of work, corporate performance, and profitability of each year. Long-term factors include balance scorecard performance evaluation.
- 5.2.6 To listen to opinion and suggestions based on professional knowledge of employees

### 5.3 Customer Treatment Policy

The Company believes in business value obtained from the continued building of customers' satisfaction and confidence as customers are always the main patron of the Company. The customer treatment policy can be summarized as follows:

- 5.3.1 To provide quality services at fair prices for customers
- 5.3.2 To provide accurate news and information to customers, avoiding any overstatements that might cause a misunderstanding about quality, quantity, or conditions of particular services
- 5.3.3 To protect customers' interests with honesty and integrity, and to provide advice on services suitable for and beneficial to the customers
- 5.3.4 Not to solicit or accept benefits from customers by abusing one's position or duty
- 5.3.5 Not to utilize customers' data for personal gains

### 5.4 Creditor Treatment Policy

The Company stipulated a policy regarding treatment of creditors with fairness and responsibility, especially in terms of credit guarantee, capital management, and defaults on payments, in a clear and concrete manner, including relevant operating procedures. For example, in terms of capital management, the Company shall maintain its liquidity ratio at sufficiently high levels and its debt to equity ratio at appropriate levels. This is to ensure that the Company can have continued debt servicing ability and make payments on time. In terms of credit guarantee, the Company shall ensure that there is no damage to credit guarantors, and shall take responsibility for any issues concerned. As for defaults on payments, the Company shall not default on payments, and shall expeditiously solve any problems arising in order to repay debts to its creditors.

### 5.5 Trading Partner and Contract Party Treatment Policy

The Company shall treat its trading partners who are a key driver of its success with equality while taking into consideration mutual interests according to the following principles.

- 5.5.1 To procure goods and services based on systems and standards as follows:

- To compete based on equal access to information
- To have criteria for assessing and selecting trading partners
- To provide decent contracts without taking advantage of contract parties
- To have in place a system of management and monitoring to ensure that contract conditions are fulfilled and to prevent corruption and misconduct at all steps of the procurement
- To make punctual payments to trading partners and contract parties according to mutually agreed upon payment terms

5.5.2 To develop and maintain sustainable relationships with trading partners and contract parties, earn mutual trust, and avoid any false advertisements or statements that mislead trading partners

5.5.3 To treat trading partners with equality and fairness based on fair share of compensation for both parties, and to strictly honor contract terms and conditions

5.5.4 To strive to build and maintain sustainable relationships with trading partners and contract parties with clear objectives in terms of quality of products and services of best value for money, quality of techniques, and mutual trust

## 5.6 Competitor Treatment Policy

The Company shall operate business within a fair competition framework by adhering to the following principles.

5.6.1 Not to seek competitors' confidential data through dishonest or indecent means

5.6.2 Not to damage competitors' reputation through defamation

5.6.3 Not to take any actions that violate intellectual property of competitors or others

## 5.7 Responsibility for Society and the Public

The Company places importance on its responsibility for society and the public as follows:

5.7.1 To comply with laws or rules concerned

- 5.7.2 To take into consideration environmental conservation and safety management

## 6. Employees' Code of Conduct

### 6.1 Treatment of the Company

Employees shall comply with laws, regulations, and rules and directives of the Company; and shall avoid being involved in activities that are illegal or detrimental to the peace and orderliness or morals of the people. Use of employees or corporate assets for illegal purposes is totally prohibited.

Apart from compliance with laws, all employees shall perform their duties according to the business code of conduct as a highly valuable asset of the Company.

#### 6.1.1 Laws and Corporate Rules

- 1) Employees shall strictly comply with laws, regulations, and rules and directives of the Company.
- 2) Violations of laws, resolutions of shareholders' meetings, resolutions of the Board of Directors, and corporate regulations, rules or directives shall be inexcusable although such actions are claimed to be for increasing the Company's profit or for other purposes.
- 3) Employee shall perform their duties with honesty and integrity by focusing on the fair benefit of the Company despite the existence of legal loopholes or gaps in the Company's rules, regulations or directives.

#### 6.1.2 Laws on Securities and Insider Information Disclosure

- 1) Employees shall strictly comply with requirements of the SEC and laws concerned. The Company shall ensure equitable information disclosure to its shareholders and/or the public.
- 2) Use of insider information which has not yet been disclosed to the public or general shareholders in trading securities for personal gains is deemed as violating the Company's code of conduct.



- 3) Relevant executives and employees having knowledge of the financial statements shall be prohibited from buying and/or selling the Company's shares for one month prior to and 24 hours after the disclosure of information.
- 4) Disclosure of information that affects the Company's business and share prices must be subject to prior endorsement by the President. The President shall take relevant actions or assign another person to be responsible for such information disclosure.
- 5) A central unit responsible for sharing information with the public and investors is an investor relations function. Owners of information shall be responsible for supplying information to such central function.
- 6) Employees shall not provide their opinion in trading securities of the Company unless they are required to perform the Company's assignments.

#### 6.1.3 Corporate Assets Protection

- 1) Employees shall have the duty and responsibility to economically use corporate assets to ensure the Company's optimized benefit and protect such assets from deteriorating or being lost.
- 2) Business data and documents are the Company's key assets so each function shall determine respective durations of retention and classification. Such documents must be kept properly and completely, and be available for auditing.
- 3) Employees shall prepare all business, accounting and finance, and reporting documents for submission to government agencies and other parties with prudence and integrity. Transactions must be recorded according to accounting practices adopted by the Company and stipulated standards.
- 4) Employees shall strictly comply with the principles of accounting, finance, and internal control at all times. They shall inform their responsible persons in their functions or the working group on good corporate governance upon detection of any operating mistakes.

#### 6.1.4 Computer System and Communications

- 1) Employees shall strictly comply with practical guidelines and directives relating to use of computer equipment and communications as well as electronic data for the benefit of the Company. They shall not take any actions that are illegal or for the benefit of one's own business. The Company shall have the right to check computer equipment usage, electronic data, or IT technologies, such as data transmission or storage, without prior authorization.
- 2) The employees shall avoid any websites deemed illegal or immoral by the Company. They shall refrain from disseminating such website or relevant content to others, and shall avoid visiting unknown websites or those suspicious of safety compromise.
- 3) The employees using the Company's computers must use software with copyrights and only those allowed by the Company to prevent any breaches of intellectual property.

#### 6.1.5 Intellectual Property

- 1) Any outputs from the performance of duties shall be deemed as the Company's intellectual property.
- 2) Outputs or information subject to external parties' rights acquired for or to be used for internal purposes shall be verified to ensure no breaches of others' intellectual property.
- 3) After the end of the employment, the persons shall hand over all intellectual property items as well as outputs of invention, including information stored in any forms, to the Company.

## 6.2 Procurement and Undertaking of Transactions

The Company intends to procure goods and services according to standards while treating its trading partners and contract parties with fairness so as to obtain quality goods and services at reasonable prices for its benefit.

### 6.2.1 Procurement

- 1) The Company shall conduct procurement according to the following principles.
  - To ensure competition with equity access to information
  - To have criteria for assessing and selecting trading partners and contract parties
  - To prepare appropriate contract conditions
  - To have in place a system of management and monitoring to ensure that contract conditions are fulfilled completely and to prevent corruption and misconduct at all steps of the procurement
  - To make punctual payments to trading partners and contract parties according to mutually agreed upon payment terms
- 2) Employees are prohibited from using information gained from the procurement for personal gains or gains of a particular trading partner, contract party, or unrelated person. Also, they shall not be involved in the procurement with a contract party in connection with themselves, such as family members, close relatives, or businesses they own or partner with.
- 3) Procurement shall be conducted strictly according to the operating procedures and directives regarding procurement by responsible functions within the scope of authority to take actions.
- 4) Employees shall refrain from taking any actions that would enable trading partners from avoiding tax payments to authorities.
- 5) The Company prioritizes local employment to support Thailand's industry sector and save costs.

#### 6.2.2 Undertaking of Transactions between the Company and/or its subsidiary

- 1) Employees shall carefully study criteria, methods, steps of action, and authority to take actions as per the Company's operating procedures before undertaking relevant transactions.
- 2) If the employee is required to be involved in a related party transaction, one must report the matter to one's supervisor, including relevant conditions, criteria, or nature of the transaction in detail.

- 3) Undertaking a project or a related party transaction must be in strict compliance with relevant regulations, laws, and rules of the Company.
- 4) Employees may reach out to their supervisors or the corporate secretary for any questions concerned.

#### 6.2.3 Undertaking of Transactions with External Persons or Companies

- 1) Undertaking transactions must be based on considerations of amounts, values, prices, qualities, and service conditions, which must be according to market mechanisms or fair prices. There shall be neither discrimination nor obstruction of business by illegitimate or illegal means.
- 2) Employees shall refrain from undertaking transactions that may cause damage to the Company's reputation despite losses of business opportunities.
- 3) Employees are prohibited from using names of the Company and its directors or employees for undertaking transactions not relevant to the Company although there is no direct impact on the Company.

### 6.3 Prevention of a Conflict of Interest

The Company would like its employees to avoid a conflict of interest that may influence any decisions. In the performance of duties, the employees shall uphold the interests of the Company while complying with laws and the code of conduct.

#### 6.3.1A Conflict of Interest

- 1) Employees shall avoid a conflict of interest with the Company when contacting trading partners or other parties.
- 2) During or after the employment with the Company, the employees shall not reveal any confidential corporate data, including electronic, financial, operating, business, future plan, and other information, for the benefit of any person.
- 3) The employees shall not operate or conduct any activity or make any investment that is deemed as in competition or may be in competition with the

Company's business. In the case where the employees or their family members involve in or become a shareholder of any business at a significant level which may have a conflict of interest or a business conflict, they must report the matter to the President/Managing Director or top executive of the Company for acknowledgement in writing soonest.

- 4) The employees shall be abstaining from holding shares that lead them to have authority to make decisions in competitors' companies, especially if such action leads to their performing or refraining from performing duties. In the case where the employees obtain such shares before the employment with the Company or before the Company's entering into such business, or through inheritance, they shall report the matter to their respective supervisors.
- 5) Assuming a position of director or advisor in another company, organization, or association, must neither result in a conflict of interest nor contradict the performance of duties for the Company. Also, such action must be subject to prior approval by the Board of Directors or the Executive and Risk Management Committee/the President or top executive of the Company.
- 6) Employees shall not raise loans from the Company's trading partners as it could influence the performance of duties as the Company's representatives. An exception applies to the case of financial institutions.
- 7) Employees shall be prohibited from disbursing payments or delivering corporate assets to any persons without proper authorization.
- 8) Employees must not spend their working hours doing tasks of other employers unless such action is necessary and receives prior approval from respective supervisors.

#### **6.4 Employees' Treatment toward Others**

The Company realizes the value of human resources and would like its employees to be proud of their organization. A work atmosphere of collaboration and equal career advancement opportunities shall be encouraged. Employees shall be getting a chance to constantly develop

themselves to have knowledge and capabilities at a broader scale for their enhanced value and business excellence.

- 1) Supervisors shall behave themselves to gain respect from their employees, and employees shall abstain from any actions that are disrespectful toward their supervisors.
- 2) All employees must not commit any acts that violate or harass others verbally or any offenses based on race, gender, religion, age, or physical and mental disabilities.
- 3) Employees shall perform their duties with honesty, integrity, due care, quality, and efficiency, bearing in mind the development of their organization toward excellence.
- 4) Employees shall not wrongly accuse executives or other employees using false statements.
- 5) Employees shall collaboratively foster and maintain an atmosphere with a sense of solidarity and unity among themselves.
- 6) Employees shall avoid any actions that may be damaging the Company's reputation or causing problems to the Company. Employees shall preserve their dignity and gain social acceptance.

## **6.5 Safety, Health, Society, and Environment**

The Company is committed to ensuring the well-being of its employees, surrounding communities, and workplace while protecting the environment. To this end, it established a set of operating procedures for work safety according to relevant laws and regulations.

### **6.5.1 Safety and Health**

- 1) The Company is striving to prevent occupational accidents, injuries, and sicknesses by seeking serious collaboration with all employees as well as limiting and mitigating safety-related risks in business operations.
- 2) The Company shall strictly comply with laws and regulations regarding safety, and shall adopt reliable safety measures for enforcement in case there is no relevant law or regulation applicable.

- 3) The Company shall provide or design tools, equipment, operating procedures, action plans, and trainings for its employees to educate and inform them of sufficient news and information about work safety to prevent hazards from machines, work procedures, or diseases and other perils.
- 4) The Company shall not allow its employees to perform work while being sick or not in good health condition to mitigate risks of work hazards.
- 5) Any employees checking in at work while having illegal substances in their body system or being under the influence of alcohol or other addictive substances at levels that can cause harm to their performance of duties shall be subject to disciplinary action.
- 6) Employees whose job duties may put their life or health at risk shall study information about hazardous or potentially hazardous work conditions and comply with proper work procedures.
- 7) At any step of work that involves risks, if not sure about potential outcomes, the employee shall cease or defer such operation and seek an expert's advice immediately.
- 8) Any irregularities at work areas that may cause harm to people's health and safety shall be reported to respective supervisors urgently.
- 9) Supervisors shall have the duty to determine or disseminate guidelines for the prevention and control of accidents and health issues for their employees and related parties. Medical check-up programs for the employees shall be conducted based on their respective risk levels.

#### 6.5.2 Responsibility for Society and Environment

The Company places importance on its responsibility for society and the public. In so doing, it complied with laws and rules concerned, exercised environmental care, and adopted measures relating to safety management. In terms of the environment, it stipulated a set of measures to mitigate environmental impacts applicable to its internal functions and repairs and maintenance facilities. Moreover, the Company encouraged its employees to economically use

resources and different kinds of energies, such as electricity, tap water, and especially fuels. Data through monitoring showed that fuel efficiency was enhanced.

## **6.6 Anti-Corruption Practices**

To ensure a clear understanding of all directors, executives, and employees about proceeding with matters that may involve possible corruption risks, they shall comply with the anti-corruption measure manual with due care.

## **7. Supervision of Compliance with Code of Conduct and Review of Code of Conduct**

It is the joint duty and responsibility of all directors, executives, and employees to acknowledge, understand, and comply with the policy on the code of conduct and desirable work practices strictly. Compliance with such policy is mandatory; and no one can cite a reason of lacking knowledge of such policy for their non-compliance therewith.

Executives at all levels must be responsible for and take it seriously when it comes to ensuring that the employees under their line of command acknowledge, understand, and comply with the code of conduct and desirable work practices vigorously.

The Company shall not tolerate any actions that are illegal or contradict professional ethics. If a director, executive, or employee is found to have committed a violation of the stipulated code of conduct, they shall be subject to strict disciplinary action. If such violation is believed to be violating laws, rules, or mandates of the government, the matter shall be submitted to a competent government official for further actions without delay.

The Board of Directors and the Audit and Corporate Governance Committee require that there be an annual review of the “Code of Conduct and Desirable Work Practices” manual.

## **8. Whistleblowing**

The Company encourages its employees and stakeholders to partake in the monitoring of the compliance with laws, regulations, good corporate governance principles, and the business code of conduct and desirable work practices. Any illegal act or business misconduct or behavior indicating



corruption or malfeasance of a person in the organization shall be reported or a complaint against such matter shall be filed in order to ensure more transparency and efficiency in business operations. Thus, the Company stipulated a set of whistleblowing measures as well as a mechanism to protect whistleblowers or complainants and reported persons. As confidentiality of data collected through whistleblowing is crucial, acquired data shall be known only by assigned persons and other concerned parties. This is to provide assurance for the whistleblowers or complainants.

### **Whistleblowing Policy**

The Company allows its internal and external stakeholders to report activities that are deemed illegal or in violation of relevant regulations, ethics, or rights; incorrect financial reports; internal control system deficiencies; or behaviors possibly indicating misconduct of persons within the organization to the Board of Directors. The stakeholders may report a case to a member of the Audit and Corporate Governance Committee or the corporate secretary for further submission to the Audit and Corporate Governance Committee for fact-finding. After due consideration, the Audit and Corporate Governance Committee shall report the case to the Board of Directors for consideration and further actions as deemed appropriate.

### **Whistleblowing Measures**

#### **1. Definitions**

- 1.1 “Whistleblowing” refers to reporting information about an activity believed to be wrongdoing according to Item 2.
- 1.2 “Whistleblower or Complainant” refers to any director, employee, stakeholder, or external party.
- 1.3 “Recipient of Whistleblowing Reports or Complaints” refers to a corporate secretary or a member of the Audit and Corporate Governance Committee.

#### **2. Matters for Whistleblowing or Complaint Filing**

The Company encourages all of its employees and stakeholders to report to it immediately upon detection of any misconduct or behavior indicating possible wrongdoing in the following matters.

- Non-compliance with laws or regulations concerned and the business code of conduct
- Corruption and fraud
- Activities suspicious of money-laundering or irregularities in terms of accounting, finance, and controls and audits

### 3. Channels for Stakeholders' Whistleblowing or Complaint Filing

There shall be two channels for whistleblowing or complaint filing as follows:

**Channel 1:** Emails of three members of the Audit and Corporate Governance Committee as follows:

- Dr. Panja Senadisai [panja.sena@gmail.com](mailto:panja.sena@gmail.com)  
Chairman of the Audit and Corporate Governance Committee
- Professor Emeritus Dr. Vinit Chovichien [c\\_vinit@hotmail.com](mailto:c_vinit@hotmail.com)  
Member of the Audit and Corporate Governance Committee
- Dr. Chaipat Sahasakul [chaipats@icloud.com](mailto:chaipats@icloud.com)  
Member of the Audit and Corporate Governance Committee

**Channel 2:** Corporate secretary through mail, telephone, and email as follows:

- Mailing to:  
Ms. Thitima Tiewprateep, Corporate Secretary  
Pylon Public Company Limited  
252 SPE Tower Building, 14<sup>th</sup> Floor, Phaholyothin Road, Samsen Nai  
Subdistrict, Phaya Thai District, Bangkok 10400
- Tel. No. 02 6151259 Ext. 108
- Email: [thitima@pylon.co.th](mailto:thitima@pylon.co.th)

#### Whistleblowing Report or Complaint Handling Process

- 1) Facts shall be collected and submitted to the Audit and Corporate Governance Committee.

A member of the Audit and Corporate Governance Committee or the corporate secretary who receives a whistleblowing report or complaint shall collect facts relating to fraud and corruption, violation or non-compliance with laws or codes of ethics, infringement of rights, incorrect financial reporting, or internal control system deficiencies. The recipient of the whistleblowing report or complaint may take relevant actions by oneself or assign other persons concerned to do so in one's stead.

- 2) The Audit and Corporate Governance Committee shall hold a meeting.

The Audit and Corporate Governance Committee shall hold a meeting to consider the report by the whistleblower or complainant based on all the facts collected, ask questions or seek further information from the management (as the case may be), and prepare a report for submission to the Board of Directors for endorsement.

- 3) The Board of Directors shall consider a report from the Audit and Corporate Governance Committee.

The Board of Directors shall consider a report from the Audit and Corporate Governance Committee and take actions as deemed appropriate accordingly.

- 4) Results shall be reported to the whistleblower or complainant.

The Board of Directors shall report results to the whistleblower or complainant if they disclosed themselves.

#### **4. Information about Whistleblower or Complainant**

The whistleblower or complainant shall provide their name-surname for the Company to contact them back and ask for more information.

In the case where the whistleblower or complainant does not intend to provide their name, the Company may conduct fact-finding based on the information received if it believes that such information could lead to a damage to the Company.

## **5. Guidelines to Protect Whistleblower or Complainant**

Guidelines to protect the whistleblower or complainant from bullying, threatening, or disposal of evidence include the following.

- In fact-finding, the Company shall not reveal the name of the whistleblower or complainant.
- The Company shall keep relevant data confidential and make a disclosure only on a need-to-know basis. Safety and prevention of a possible damage to the whistleblower or complainant or relevant parties shall be priorities.
- Apart from the above, if the whistleblower or complainant still views that they could possibly be in trouble or subject to a damage, they may ask for the Company to provide protection measures for them.
- In the case where the whistleblower or complainant is an employee of the Company, there shall be no demotion, punishment or negative outcomes against the employee who says no to corruption.

## **6. Protection of the Reported Person**

The Company realizes that it shall take responsibility for the reported person by keeping data relevant to the reported person confidential during the fact-finding, and shall consider fact-finding results before deciding on the matter. The Audit and Corporate Governance Committee shall allow the reported person to explain the case before drawing a conclusion on the matter as well as acknowledge the fact-finding results.

## **7. Making an Intentionally False Report of Information**

If the whistleblower or complainant intentionally makes a false report of information, they shall not be protected under the prescribed measures, and shall be subject to disciplinary action or legal action.

## **8. Punishment**

If fact-finding results reveal that the reported person did commit wrongdoing or that the whistleblower or complainant intentionally made a false report, the recipient of the whistleblowing report or complaint shall submit the case together with their

opinion and guidelines on disciplinary measures and legal action to authorized persons for further consideration and relevant actions.

In the case of a director, executive, or employee defying the anti-corruption measures, they shall be subject to relevant disciplinary measures by the Company, for example, through warning letters, work suspension, or termination of employment where necessary.

#### **9. Report on Whistleblowing Cases**

The Audit and Corporate Governance Committee shall prepare and present a report on all whistleblowing cases to the Board of Directors while the corporate secretary shall collect relevant data for submission to the Board of Directors for endorsement.

Ultimately, compliance with the business code of conduct and desirable work practices shall be on-going, and the Company shall exercise the best of its ability to maintain and comply with the business code of conduct and desirable work practices in good faith and without avoiding such obligations.

1. I have already received and read the content in “Business Code of Conduct and Desirable Work Practices”.
2. I thoroughly understand and shall comply with the business code of conduct and desirable work practices in this document as guidance for my operations.